

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)
21 MC 103 (AKH)

ECF Case

This document pertains to all cases listed in
Schedules 1, 2, and 3

NOTICE OF MOTION

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PLEASE TAKE NOTICE that, upon the attached Declaration of Lee Ann Stevenson declared on January 11, 2012, and the accompanying memorandum in support, the undersigned will move before the Honorable Judge Alvin K. Hellerstein of the United States District Court for the Southern District of New York, at the United States District Courthouse, located at 500 Pearl Street, New York, NY 10007, at a time and place to be scheduled by this Court, for an order to dismiss the cases listed on Schedule 1 pursuant to Civ. R. 56 of the Federal Rules of Civil Procedure and the cases listed on Schedule 2 pursuant to Civ. R. 37 and 41 of the Federal Rules of Civil Procedure.

Respectfully submitted,

KIRKLAND & ELLIS LLP
*Member of the Defense Liaison Committee
For Defendants in 21 MC 102 and 103 Dockets*

/s Lee Ann Stevenson
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